

OFFICIAL ACADEMIC TRANSCRIPT



Name: John Spinner
Student ID: 4281569

Page 2 of 2

Ronald L. Bowman, Jr.
Ronald L. Bowman, Jr., University Registrar

Program: Arts & Sciences Undergraduate						2020 Summer	
Plan: Political Science BA/JD Major							
Plan: MINOR - Political Science - American Politics Minor							
Plan: MINOR - Pre-Law Minor							
Course	Description	Attempted	Earned	Grade	Points		
3700 361	Politics of the Ctrm Just Sys	3.000	3.000	A-	11.000		
3850 330	Criminology	3.000	3.000	A	12.000		
Term GPA		3.850	Term Totals	6.000	23.100		
Cumulative GPA:		3.924	Cumulative Totals	79.000	310.000		
						2020 Fall	
Program: Arts & Sciences Undergraduate							
Plan: Political Science BA/JD Major							
Plan: MINOR - Political Science - American Politics Minor							
Plan: MINOR - Pre-Law Minor							
Course	Description	Attempted	Earned	Grade	Points		
3580 202	Intermediate Spanish II	3.000	3.000	A	12.000		
3700 341	The American Congress	3.000	3.000	A	12.000		
3700 360	The Judicial Process	3.000	3.000	A	12.000		
3700 402	Politics and the Media	3.000	3.000	A	12.000		
3700 461	The Supreme Court & Const Law	3.000	3.000	A	12.000		
Term GPA		4.000	Term Totals	15.000	60.000		
Cumulative GPA		3.936	Cumulative Totals	94.000	370.000		
Term Honor: President's List							
Undergraduate Career Totals		94.000		370.000			
Cumulative GPA:		3.936		Cumulative Totals			
Non-Course Milestones							
Completion of Ohio Transfer Module							
Status: Completed							
Program: Arts & Sciences Undergraduate							
Date Completed: 06/13/2019							
Date Attempted: 06/13/2019							
Submitted Work							
..... End of Transcript							

J. Noah Spinner

1871 14th St., Cuyahoga Falls, Ohio 44223
 (330)-962-3364 • jns110@uakron.edu

Unofficial Grade Sheet

The following is an Unofficial Grade Sheet reflecting my courses taken, their respective instructors, credit hours, and final grade awarded. All courses, unless otherwise indicated, were taken at The University of Akron School of Law. I attest all grades and GPAs listed are accurate to the best of my knowledge. An official transcript has also been attached.

Sincerely,

J. Noah Spinner

Spring 2021

Course	Instructor	Credit Hours	Grade
Civil Procedure: Fed. Litigation	Bernadette B. Genetin	3.0	A-
Criminal Law	Dana Cole	3.00	A
Fundamentals of Lawyering	Nancy Reeves	0.00	CR
Legal Research, Analysis, and Writing I	Sarah Starnes	3.00	A
Legislation and Regulation	Richard Lavoie	2.00	A-
Property Law	Brant Lee	4.00	A-

Term GPA: 3.82

Cumulative GPA: 3.82

Summer 2021

Course	Instructor	Credit Hours	Grade
Legal Research, Analysis, and Writing II	Sarah Starnes	3.00	A

Term GPA: 4.00

Cumulative GPA: 3.85

Fall 2021

Course	Instructor	Credit Hours	Grade
Civil Procedure Fed. Jurisdiction	Christopher J. Peters	3.00	A
Constitutional Law: Government Authority	Martin H. Belsky	3.00	A
Contracts	Carolyn L. Dessin	4.00	A
Law Review Staff	Willa Gibson	1.00	CR
Legal Drafting	Willa Gibson	3.00	A
Torts	George Horvath	4.00	A

Term GPA: 4.00

Cumulative GPA: 3.921

Spring 2022

Course	Instructor	Credit Hours	Grade
Constitutional Law: Individual Rights	Martin H. Belsky	3.00	A-
Environmental Law	James Yskamp	3.00	A-
Law Review Staff	Willa Gibson	1.00	CR
Professional Responsibilities	John ("Jack") P. Sahl	3.00	B+
Secured Transactions	Richard Lavoie	3.00	A

Term GPA: 3.675

Cumulative GPA: 3.857

Summer 2022

Course	Instructor	Credit Hours	Grade
*Comparative Criminal Law	Dana Cole	1.00	CR
*European Union Law I	Dermot Cahill	2.00	CR
*European Union Law II	Dermot Cahill	2.00	CR
Judicial Externship	Alisa Benedict O'Brien	3.00	CR

Term GPA: Credit

Cumulative GPA: 3.857

* These courses do not appear on my official law school transcript. They were taken as part of a study abroad program to Ireland through the University of Missouri-Kansas City School of Law, and will transfer upon my graduation. Records available on request.

Fall 2022

Course	Instructor	Credit Hours	Grade
Administration of Criminal Justice	Michael Gentithes	3.00	A-
Evidence	Dana Cole	3.00	A
Law Review Staff	Willa Gibson	2.00	CR
Social Justice	Brant Lee	3.00	A
UCC Sales	Vera Korzun	3.00	A

Term GPA: 3.931

Cumulative GPA: 3.873

Spring 2023

Course	Instructor	Credit Hours	Grade
Civil Rights and Access to Healthcare	George Horvath	2.00	<i>In Progress</i>
Foreign, Comparative, and International Law Research	Kerry Lohmeier	2.00	<i>In Progress</i>
International Negotiations	Vera Korzun	3.00	<i>In Progress</i>
Law Review Staff	Stefan Padfield	1.00	<i>In Progress</i>
Wills, Trusts, and Estates	Carolyn Dessin	4.00	<i>In Progress</i>

March 28, 2023

The Honorable Jamar Walker
Walter E. Hoffman United States Courthouse
600 Granby Street
Norfolk, VA 23510-1915

Dear Judge Walker:

Noah Spinner has asked me to write a letter of support for his application for a clerkship in your chambers. It is my judgment, having had him for several classes during his undergraduate career, that he is a dedicated, intelligent, and extremely hardworking student. I have had the pleasure of having Noah in four of my classes and I can confidently say that he is one of the best students I have had since I began teaching at The University of Akron in the Fall of 2012. He comes to class with a positive attitude, is always prepared, and enhances the classroom atmosphere. In addition, he was active, engaged, and willing to participate in all the classes he took with me.

He has asked me to provide you with insight into his writing skills and academic successes while earning his undergraduate degree in the Political Science Department at the University of Akron. As a result, this letter will focus on Noah's attributes as a student and provide insight into his abilities and character in that regard. I believe that Noah has both the professional as well as the personal characteristics that make him worthy of serving as a clerk. Students like Noah are the reason that I went into teaching and I miss having him in class. Serving as a clerk will provide him with a valuable opportunity to continue to learn and grow. At the same time, I think he will be an asset to you as well.

Noah distinguished himself among his peers for many reasons. He was one of the most serious and competent students in each class he took with me. His attendance was outstanding and he consistently came to class prepared to answer questions and he always participated in class discussions. In all of my classes, he finished the semester near the very top of the class, no matter the subject. He was an great student while also maintaining a rigorous work schedule outside of class. To me, this displays his strong commitment to his studies as well as his versatility as a student.

Noah demonstrated his intellectual ability and commitment in every class he took with me. Students in my classes are required to participate in a range of activities in order for me to gauge a variety of skills. He works well with others and he has strong writing, critical analysis, and communication skills. Additionally, students are required to read, interpret, and analyze Supreme Court decisions and scholarly articles. These are all areas in which he excels. In addition, Noah consistently completed and submitted his work in a timely fashion.

In my Introduction to Political Research class, he demonstrated his ability to conduct research and write in a clear and comprehensive fashion. Though analyzing empirical research can be a daunting task for undergraduate students, Noah did an outstanding job. For his final paper, he displayed a firm grasp of the research process. During the course of his research, he identified relevant variables related to his topic. He also created clear hypotheses, located appropriate quantitative research articles related to his topic, and he skillfully integrated his research into a sound literature review. Finally, he created an excellent research design that could be used to test his original hypotheses. The final result of his efforts was a sophisticated analysis of a very important social issue.

Noah also has a strong grasp of landmark Supreme Court cases and is able to use Supreme Court precedents to tackle current issues and questions before the courts. Thus, he understands many of the past decisions handed down by the Court and he

Phillip Marcin - pjm@uakron.edu - 3309726480

can use those precedents to structure arguments on pending cases. In my Constitutional Law and Civil Liberties classes, students are required to read and analyze Court decisions each week and critically analyze them. Each and every week, he surpassed his peers with the quality and depth of his assignments. Each analysis he submitted was a comprehensive and clear analysis of complicated material.

He always received high scores on his assignments/exams. He was always prepared when he was asked questions in class. He frequently raised insightful and thoughtful questions about class subjects and demonstrated a strong grasp of class material. He has excellent communication skills and is willing to work with his fellow students. Additionally, he is an excellent writer. I can confidently say that his contributions to my classes improved the classroom experience for everyone. Noah is a hardworking, diligent, and serious student. He is respectful and helpful to those around him. No matter the class or time of year, he always brought a positive and constructive attitude to class and he was always willing to help others in need of assistance. I have seen this firsthand many times and I know that he acts this way consistently since he exhibited these qualities in all of his classes with me. I wish I had an entire class full of students of his caliber.

In addition to Noah's outstanding academic record, he genuinely cares about improving the world around him. I believe this to be equally important to his academic record. He is passionate about improving the world and this is reflected in his actions. He ran for office on a platform of improving the environment and reducing gun violence. His scholarship emphasizes greater citizen engagement in judicial elections. He recognizes that, through hard work and dedication, he can have a positive impact in the world. Frankly, I take comfort in the knowledge that people like Noah will help shape the world that my two young children will grow up in.

Ultimately it is my judgment that Noah has the skills and motivation to handle any work he is assigned, and I believe that he will excel as a clerk in your chambers. He is also motivated and eager to learn more and I believe that this combination of skills and drive will serve him well in this position. In my opinion, he will be a definite asset.

Please contact me if you would like more information or wish to speak in person, or by phone or email.

Dr. Phil Marcin
Professor of Instruction
The University of Akron
Olin Hall 201a
Email: pjm@uakron.edu
(330) 972-6480

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March 28, 2023

The Honorable Jamar Walker
Walter E. Hoffman United States Courthouse
600 Granby Street
Norfolk, VA 23510-1915

Dear Judge Walker:

I am writing today in support of John (Noah) Spinner and to recommend him for a federal judicial clerkship. Noah is an outstanding student and individual. He is thoughtful, kind, dedicated, hard-working, and thorough in everything he does.

Noah began his law school career in the Spring of 2021 as one of the first members in Akron's 3+3 program, where he completed his last year of undergrad during his first year of law school. This alone demonstrates an eagerness to enter the legal field. It was apparent from the beginning of his first semester that he would be one of the brightest minds in my Legal Analysis, Research, and Writing classes. He was motivated to complete both classes in the spring and summer of 2021, with the goal of earning a spot on Akron's Law Review before completing his first full year of school.

As both a writing professor and librarian, I urge first year law students to take to heart how important writing and research is. There is no doubt Noah internalized this. He not only made Law Review but wrote an incredible note and is the incoming Executive Editor of Student Writing for the upcoming school year. He has also received academic commendation for his work in legal drafting. Halfway through his legal education, Noah has clearly demonstrated his commitment and desire for learning, maintaining his rank well within the top 5% of his class.

Working as hard as Noah does illustrates his dedication, passion, and eagerness to succeed and make an impact on the legal field. He clearly wants to make a difference and be a positive influence on others, as demonstrated by his leadership in the Akron Black Stocking's vintage baseball club, serving on student government, and being an active member and Eagle Scout in the Scouts BSA. His choice to serve as a fellow for the Akron Law PLUS Program shows his commitment to others, especially those less fortunate, and how important it is and how it's possible that they could attend and succeed in law school themselves.

Having such qualities like eagerness to learn, ingenuity, and exceptional communication skills are the keys necessary to become an asset to the legal profession. Noah encompasses all of these and would be an excellent clerk. I give him my recommendation gladly and without hesitation. If I can be of further assistance to you in your deliberations, please contact me.

Sincerely yours,
Sarah K. Starnes, Esq.
Associate Law Librarian, Reference Services
Adjunct Professor of Legal Analysis, Research, and Writing

Sarah Starnes - sstarnes@uakron.edu - 330 972 5291

March 28, 2023

The Honorable Jamar Walker
Walter E. Hoffman United States Courthouse
600 Granby Street
Norfolk, VA 23510-1915

Dear Judge Walker:

I had the pleasure of teaching and supervising John Spinner. Mr. Spinner was one of my top students in my courses - Constitutional Law I & II. Even though grades are anonymous, I have taken the opportunity of this reference letter to secure his papers and review them. Mr. Spinner was able to digest very complex fact patterns in both exams and to identify the issues, explain the legal aspects relating to those issues, and make conclusions. His papers were enjoyable to read.

I am not surprised that Mr. Spinner's exams were so well-written and analytical. I also had the opportunity to oversee his law review article "Called Strike Three." The paper went through several drafts, as all law review papers do. However, even in Mr. Spinner's first draft it was clear that he had done careful research and thoughtful analysis. His thesis was about a recent Ohio Law that provides for party labels of candidates for Ohio Courts of Appeals and Supreme Court. As is obvious by the title, he used a baseball analogy - how an impartial "umpire" would review the pros and cons and make a "call." Again, Mr. Spinner's writing is clear and analytical. As with his exams, it was enjoyable to read. More significantly, I learned a great deal about the issues and the history, politics, and impact of the new law.

Mr. Spinner's resume indicates his excellence. He is a named editor of the Law Review, helps potential and new students understand law school education and particularly Akron Law. His involvement in outside activities also shows his commitment to whatever he does.

In addition, hidden down in his resume is an activity that shows Mr. Spinner's sense of fun and why I always find my interactions with him to be both serious and enjoyable. For a number of years, he had served as the University's mascot - Zippy. That "job" requires him to interact with lots of people and respond warmly. It also involves a great deal of preparation and a large time commitment. He was able to do this and still manage to be a top student. That kind of time management and personal touch shows both his maturity and competence.

I hope you will seriously consider Mr. Spinner. He is an outstanding young man - student researcher, writer, leader, person.

Please feel free to contact me by cell call or message at 928-645-7837 or email, belsky@uakron.edu.

Sincerely yours,

Martin H. Belsky

Martin Belsky - belsky@uakron.edu - 330-972-6361

J. Noah Spinner

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(330)-962-3364 • jns110@uakron.edu

Writing Sample

The following writing sample is from a case and order I researched and wrote in collaboration with Judge J. Philip Calabrese and his law clerk during my summer externship experience. **The parties and case number have been changed to protect the parties' interest and reflect confidentiality.** Certain sections have been omitted for length. A full version is available upon request.

The case surrounds a 42 U.S.C. § 1983 claim brought by two former officers (plaintiffs) against their former employer, Metro City, and Metro City's former mayor and interim police chief. In light of a press conference held by the interim police chief, which asserted allegations against plaintiffs, plaintiffs brought this suit claiming false light (state claim), as well as deprivation of both procedural and substantive due process as guaranteed by the Constitution.

Sincerely,

J. Noah Spinner

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

BUD ABBOT and)	Case No. 123-456
JAKE BLUES,)	
)	Judge J. Philip Calabrese
Plaintiffs,)	
)	Magistrate Judge
v.)	Jonathan D. Greenberg
)	
LOUISE CAMPANELLA, <i>et al.</i> ,)	
)	
Defendants.)	
)	

OPINION AND ORDER

This case stems from events transpiring on August 2, 2015, where Defendant Louise Campanella was arrested and subsequently acquitted on domestic violence charges. Following Ms. Campanella's arrest, Plaintiffs, Chief of Police Bud Abbot and Deputy Chief of Police Jake Blues, claim that Ms. Campanella, then mayor of Metro City, led a campaign of hostility and retribution against the police department because of their involvement in her arrest. Plaintiffs assert that Ms. Campanella's vendetta against them and the City's police department eventually led to their departure from the City's employ.

Following Plaintiffs' leave from the City, Interim Police Chief Leo McGary conducted an internal investigation into Plaintiffs' handling of Ms. Campanella's case. After the investigation, Mr. McGary held a press conference, summarizing the investigation and its findings. Plaintiffs assert that Mr. McGary's statements put them in a false light by accusing them of tampering with evidence. Plaintiffs sued

Ms. Campanella, Mr. McGary, and Metro City, asserting that Defendants deprived them of procedural and substantive due process, defamed them, invaded their privacy, breached their settlement agreement, and that they have since spoliated evidence. Each Defendant now moves for summary judgement. For the reasons that follow, the Court **GRANTS in part** Defendants' motions for summary judgment and **DISMISSES** all of Plaintiffs' claims.

BACKGROUND

Having reviewed the record, construing the facts in light most favorable to Plaintiffs, the non-moving parties, the Court's decisions is based on the following facts.

A. The Arrest

On August 2, 2015, members of the City's police department responded to Ms. Campanella home upon suspicion of domestic violence against her son. (ECF No. 1, ¶ 12, PageID #8.) Mr. Abbot, the Chief of Police for the City, instructed his department to take the case to an outside prosecutor for impartial and independent review. (*Id.*, ¶ 15, PageID #9.) The outside prosecutor recommended charges against Ms. Campanella for domestic violence, which was seconded by an assistant county prosecutor seconded the recommendation. (*Id.*, ¶ 16 & 17, PageID #9.) Ms. Campanella was then arrested and charged with domestic violence and aggravated menacing. (*Id.*, ¶ 18, PageID #9.) A special prosecutor and visiting judge were assigned to her case. (*Id.*)

Ms. Campanella's arrest was widely publicized by local media. (ECF No. 62, PageID #1599.) The charges against Ms. Campanella were eventually dismissed after a finding that the evidence against Ms. Campanella was inadmissible. (*Id.*, ¶ 19, PageID #10.) Ms. Campanella and the City ultimately reached a financial settlement following her acquittal. (ECF No. 64, PageID #1883.) This agreement, while confidential, was made public at the urging of the City Council, paid Ms. Campanella \$450,000 and contained waiver and release provisions. (ECF No. 63, PageID #1674; ECF No. 64-8.)

B. Ms. Campanella's Police Department Reform

Plaintiffs maintain that following these events, Ms. Campanella began a campaign of retribution against them and the City's police department. (*Id.*, ¶ 21, PageID #10.) Plaintiffs claim that Ms. Campanella changed work hours, sick-time, and complaint policies and procedures against fellow officers. (ECF No. 1, ¶ 19, PageID #11.) Ms. Campanella maintained that the reforms were a key part of her initial election campaign and the policies implemented were meant to "enhance efficiency and professionalism of the police force." (ECF No. 62-1, ¶¶ 3-5, PageID #1619.)

Plaintiffs assert that Ms. Campanella's actions ultimately led to their premature exits from the City's police department. (*Id.*, ¶ 20(A), (B), PageID #11.) Citing Ms. Campanella and Mr. McGary's "campaign of harassment," Mr. Blues retired and left the force in January 2016. (*Id.*, ¶ 20(A), PageID #11.) Mr. Abbot was subsequently "suspended and dismissed" by Ms. Campanella on June 7, 2016, for

incompetency, neglect of duty, insubordination, and other various infractions. (*Id.*, ¶ 20(B), PageID #11; ECF No. 64.3.) Both Mr. Abbot and Mr. Blues entered into settlement agreements with the City upon their departures. (*Id.*, ¶¶ 20(A), 20(B), PageID #11.) The settlement agreements established rights and relationships between Plaintiffs and the City, including pension and benefit rights, release and waiver of claims and actions against the City and its employees arising out of Plaintiffs' departure, and confidentiality with respect to the terms of the settlement agreements. (ECF No. 63-9; ECF No. 63-11.)

Following Mr. Blues's departure, Mr. McGary, a retired Cleveland police officer and reserve officer with the City, was then appointed as the Interim Deputy Chief on March 8, 2016. (ECF No. 1, ¶ 5, PageID #6; ECF No. 65, PageID #2101.) Mr. McGary was then promoted to the City's Interim Chief of Police on June 7, 2016. (ECF No. 65, PageID #2102.)

C. The Internal Investigation

When Mr. McGary became Interim Police Chief, he found in the Deputy Chief's desk—which was formerly Mr. Blues's—a flash drive containing information regarding Ms. Campanella's domestic-violence case. (ECF No. 65, PageID #2102). Later, on June 1, 2017, Mr. McGary was asked by the City's attorneys to obtain Ms. Campanella's case file, which he was told had been copied numerous times by Mr. Abbot and Mr. Blues. (*Id.*) Mr. McGary, who then moved into Chief of Police's office—Mr. Abbot's former office, discovered numerous documents and files concerning Ms. Campanella's arrest not included in the initial report. (*Id.*, PageID #2102–03.)

Concerned about these findings, Mr. McGary compiled the evidence and conducted an internal investigation into Ms. Campanella's arrest and how it was handled. Before releasing his findings, Mr. McGary had his investigation report reviewed by James McDonnell, a special prosecutor appointed by the City to oversee the investigation. (ECF No. 65, PageID #2103.) Mr. McDonnell opined that the investigation was sufficient to establish probable cause to arrest Mr. Abbot and Mr. Blues for tampering with evidence and that that Mr. Abbot's actions constituted as a dereliction of duty. (ECF No. 62-5)

D. The Press Conference

Later on, various members of the public demanded the release of Ms. Campanella's arrest records and settlement agreement with the City. (ECF No. 1, ¶ 22, PageID #12.) On July 29, 2017, City Councilman Kevin Roberts submitted a records request under Ohio law to obtain documents relating to Ms. Campanella's settlement agreement and arrest, threatening a lawsuit if the records remained withheld. (ECF No. 52-8, PageID #832–33; ECF No. 62, PageID #1600; ECF No. 70, PageID #2196.) At the direction of Ms. Campanella, partial records of her settlement agreement and arrest were released, including the settled amount. (ECF No. 70, PageID #2196; ECF 52-9, PageID #834–38.)

Shortly thereafter, on August 3, 2017, Mr. McGary held a press conference at the direction of the City. (ECF No. 1, ¶ 23, PageID #23.) In his remarks, Mr. McGary noted that it was an election year and wanted to get the facts straight regarding Ms. Campanella's arrest. (ECF No. 62-6.) Although he never mentioned Mr. Abbot and

Mr. Blues by name, Mr. McGary stated that there was probable cause to bring charges of tampering with evidence against two supervisory officers of the City's police department at the time of Ms. Campanella's arrest. (ECF No. 62-6; *See also* ECF No. 1, ¶ 23, PageID #13.) Mr. McGary made these remarks while also noting the reviewing prosecutor recommended the City not pursue the criminal charges. (ECF No. 62-6.) Mr. McGary continued that the officers' investigation into Ms. Campanella was politically motivated, and the charges imposed were "trumped-up" in retaliation against Campanella. (*Id.*)

Following these events, Ms. Campanella lost her reelection campaign. (ECF No. 1, ¶ 26, PageID #14.) Plaintiffs allege that during the remainder of Ms. Campanella's term, Ms. Campanella and Mr. McGary destroyed or altered evidence to interfere with or obstruct any potential action involving Plaintiffs. (*Id.*, ¶¶ 76–81, PageID #26.) No documents or other forms of evidence alleged to have been destroyed have been proffered by Plaintiffs, and no evidence has been provided to further support their claim for spoliation of evidence.

PROCEDURAL HISTORY

[This section has been omitted for length. Plaintiffs had originally filed separate claims in state court in 2017, removing them then to federal court. Upon their removal, motion for summary judgement was granted in favor of Defendant Metro City, and claims against Metro City were dismissed.]

SUMMARY JUDGEMENT STANDARD

Summary judgment is appropriate “if the movant shows that there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law.” Fed. R. Civ. P. 56(a). On a motion for summary judgment, “the judge’s function is not [] to weigh the evidence and determine the truth of the matter but to determine whether there is a genuine issue for trial.” *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 249 (1986). The Court, in doing so, must view the evidence in the light most favorable to the non-moving party. *Kirilenko-Ison v. Board of Educ. of Danville Indep. Schs.*, 974 F.3d 652, 660 (6th Cir. 2020) (citing *Matsushita Elec. Indus. Co.*, 475 U.S. 574, 587 (1986)).

“The party seeking summary judgment has the initial burden of informing the court of the basis for its motion” and identifying the portions of the record “which it believes demonstrate the absence of a genuine issue of material fact.” *Tokmenko v. MetroHealth Sys.*, 488 F. Supp. 3d 571, 576 (N.D. Ohio 2020) (citing *Celotex Corp. v. Catrett*, 477 U.S. 317, 322 (1986)). The non-moving party must then “set forth specific facts showing there is a genuine issue for trial.” *Id.* (citing *Anderson*, 477 U.S. at 250). “When the moving party has carried its burden under Rule 56(c), its opponent must do more than show there is some metaphysical doubt as to the material facts.” *Matsushita*, 475 U.S. at 586.

If a genuine dispute exists, meaning “the evidence is such that a reasonable jury could return a verdict for the nonmoving party,” summary judgement is not appropriate. *Tokmenko*, 488 F. Supp 3d at 576 (citing *Anderson*, 477 U.S. at 250). If

the evidence, however, “is merely colorable or is not significantly probative,” summary judgment for the movant is proper. *Id.* The “mere existence of some factual dispute between the parties will not defeat an otherwise properly supported motion for summary judgment.” *Scott v. Harris*, 550 U.S. 372, 380 (2007) (quoting *Anderson*, 477 U.S. at 247–48).

“Just as plaintiff may not rely on conclusory allegations to proceed past the pleading stage, so too a plaintiff may not rely on conclusory evidence to proceed past the summary-judgment stage.” *Viet v. Le*, 951 F.3d 818, 823 (6th Cir. 2020) (cleaned up). “Conclusory statements unadorned with supporting facts are insufficient to establish a factual dispute that will defeat summary judgment.” *Id.* (quoting *Alexander v. CareSource*, 576 F.3d 551, 560 (6th Cir. 2009)).

ANALYSIS

I. Section 1983 Claims

Plaintiffs, in Count I and II of their complaint, allege that Defendants deprived them of procedural and substantive due process because they were not afforded a name-clearing hearing after the August 2017 press conference. (ECF No. 1, ¶ 41, PageID #17–18.)

Section 1983 makes a person acting under color of State law liable for depriving a citizen of rights, privileges, or immunities guaranteed by the Constitution or federal law. 42 U.S.C. § 1983. Therefore, to find a person liable under Section 1983, the alleged person must be (1) acting under color of State law and (2) must have deprived the injured party of rights, privileges, or immunities guaranteed by the Constitution

or federal law. *Bloch v. Ribar*, 156 F.3d 673, 677 (6th Cir. 1998) (citing *Parratt v. Taylor*, 451 U.S. 527, 535 (1981)).

The Court finds that both Mr. McGary and Ms. Campanella were acting under color of State law. While there is a dispute as to whether Mr. McGary was properly appointed as the interim chief of police, there is no dispute that Mr. McGary was charged with and carried out the responsibilities and duties of chief of police for Defendant City. Further, because the City directed Mr. McGary to hold the press conference in which the claims in this case arise, the Court concludes that Mr. McGary was acting within his official capacity under the color of State law when he made his remarks.

As for Ms. Campanella, her involvement in the August 2017 press conference is disputed, but for the sake of this motion, is not disputed that any action she is alleged to have taken was when she was mayor of the City.

Therefore, the question then is whether Ms. Campanella and Mr. McGary deprived Plaintiffs of their due process rights.

I.A. Procedural Due Process Claim

[This section has been omitted for length. The Court found that “Plaintiffs proffer[ed] no evidence to support their constitutional right to a name-clearing hearing.”]

I.B. Substantive Due Process Claim

Plaintiffs also assert a substantive due process claim under Section 1983. They allege that Defendants violated their rights by depriving them of their reputations,

good names, prospective job opportunities, and lost wages because of the August 2017 press conference.

There are two types of substantive due process claims: (1) “claims asserting [a] denial of a right, privilege, or immunity secured by the Constitution or by federal statute other than procedural claims” and (2) actions by government officials that “shock the conscience.” *Meritek v. Blalock*, 983 F.2d 1353, 1367-68 (6th Cir. 1993); *see also Braley v. City of Pontiac*, 906 F.2d 220, 224-25 (6th Cir. 1990); *Wilson v. Beebe*, 770 F.2d 578, 583 (6th Cir. 1985). Plaintiffs maintain their claim falls into the latter category only. (ECF No. 71, PageID #2412–13.)

The Court adopts a high standard when determining if conduct by government officials shocks the conscience. *See Garcia v. Thorne*, 520 F. App’x. 304, 309 (6th Cir. 2013). Conduct that shocks the conscience must be so severe “as to transcend the bounds of ordinary tort law and establish a deprivation of constitutional rights,” and violate the decencies of civilized conduct. *Parate v. Isibor*, 868 F.2d 821, 833 (6th Cir. 1989) (quotation omitted); *Range v. Douglas*, 763 F.3d 573, 589-90 (6th Cir. 2014). The conduct must be “truly extraordinary in nature.” *Draw v. City of Lincoln Park*, 491 F.3d 550, 556 (6th Cir. 2007); *see also Garcia*, 520 F. App’x at 309.

Plaintiffs allege that Defendants’ conduct, namely the statements made by Mr. McGary, shock the conscience. Specifically, Plaintiffs claim that Mr. McGary’s appearing in a police uniform and claiming to be the chief of police, having the city council president authorize a special prosecutor to investigate Ms. Campanella’s 2015 arrest, publicly accusing Plaintiffs of tampering with evidence and obstruction of

justice, and asserting he was appalled by Plaintiffs' conduct in Ms. Campanella's 2015 arrest shocks the conscience. (ECF No. 71, PageID #2405–06, 2412–13.) Plaintiffs also allege Ms. Campanella's act of releasing a press statement calling them "rogue police leaders" further shocks the conscience. (ECF No. 70, PageID #2203.)

Drawing all reasonable inferences in favor of Plaintiffs, the non-moving parties, and ignoring for the moment that Plaintiffs were not deprived of any property right, the Court is not convinced that the statements made by Mr. McGary shocked the conscience. *See Garcia*, 520 F. App'x at 309 (concluding multiple calls made by the police in the middle of the night does not shock the conscience); *Parate*, 868 F.2d at 832–33 (concluding not renewing a contract of employment does not shock the conscience; *Vasquez v. City of Hamtramck*, 757 F.2d 771, at 772–73 (6th Cir. 1985) (concluding an alleged "malicious prosecution" and issuing a warrant for unpaid parking tickets does not shock the conscience); *Lillard v. Shelby Cnty. Bd. of Educ.*, 76 F.3d 716, 726 (6th Cir. 1996) (concluding even a track coach slapping a student in the face, as the Sixth Circuit so finds, falls short of "brutal" or "inhumane" activities as to shock the conscience).

Nothing said during the press conference violated the "decencies of civilized life" nor "transcend[ed] the bounds of ordinary tort law." The press conference was initiated at the public's inquiry of Campanella's arrest and at the City's urging. (ECF No. 1, ¶¶ 22–23, PageID #12–13; ECF No. 71, PageID #2405.) Mr. McGary merely rehashed what the internal investigation uncovered, which was reviewed by an

independent special prosecutor. (ECF No. 65, PageID #2103.) Therefore, Defendants' undisputed actions and relevant conduct fails to shock the conscience.

II. State Claims

[This section has been omitted for length. The Court however found "[i]n light of the procedural background of this case—specifically that Plaintiffs had an opportunity to litigate their claims in state court, the complexity of the pending states claims, and the interests of judicial economy—the Court **DISMISSES WITHOUT PREJUDICE** Plaintiff's State-law claims of defamation, invasion of privacy, breach of contract, and spoliation of evidence."]

CONCLUSION

For the foregoing reasons, the Court **GRANTS** Defendant motion to summary judgement on Plaintiffs' Section 1983 claims (Counts I & II) and **DISMISSES** them **WITH PREJUDICE**. Further, the Court **DISMISSES WITHOUT PREJUDICE** Plaintiffs' State-law claims (Counts III–VI.)

SO ORDERED.

Dated: [_____]

J. Philip Calabrese
United States District Judge
Northern District of Ohio

Applicant Details

First Name	Daniel									
Last Name	Stainkamp									
Citizenship Status	U. S. Citizen									
Email Address	dkamp@email.unc.edu									
Address	<table><tbody><tr><td>Address</td></tr><tr><td>Street</td></tr><tr><td>206 Purefoy Road</td></tr><tr><td>City</td></tr><tr><td>Chapel Hill</td></tr><tr><td>State/Territory</td></tr><tr><td>North Carolina</td></tr><tr><td>Zip</td></tr><tr><td>27514</td></tr></tbody></table>	Address	Street	206 Purefoy Road	City	Chapel Hill	State/Territory	North Carolina	Zip	27514
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206 Purefoy Road										
City										
Chapel Hill										
State/Territory										
North Carolina										
Zip										
27514										
Contact Phone Number	(704) 246-9256									

Applicant Education

BA/BS From	University of North Carolina-Chapel Hill
Date of BA/BS	May 2009
JD/LLB From	University of North Carolina School of Law
	https://law.unc.edu/
Date of JD/LLB	May 1, 2024
Class Rank	20%
Law Review/Journal	Yes
Journal(s)	The North Carolina Law Review
Moot Court Experience	No

Bar Admission**Prior Judicial Experience**

Judicial Internships/ Externships	No
Post-graduate Judicial Law Clerk	No

Specialized Work Experience

Recommenders

Frampton, Mary Louise
mframpton@ucdavis.edu
530 - 752 - 3273

Gurvich, Rachel
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Kennedy, Joseph
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This applicant has certified that all data entered in this profile and any application documents are true and correct.

Daniel E. Stainkamp

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May 17, 2023

The Honorable Jamar Walker
United States District Court for the Eastern District of Virginia
600 Granby Street
Norfolk, VA 23510

Dear Judge Walker:

I am a 3L and a Merrill & Holt Scholar at the University of North Carolina School of Law, where I am ranked in the top twenty percent of my class. I serve as the Comments Editor of the North Carolina Law Review, for which I have the privilege of reviewing student scholarship, offering authors feedback, and preparing their work for publication. During the 2023–2024 academic year I plan to extern with the Federal Public Defender for the Eastern District of North Carolina, drafting appellate and trial briefs and entering duty court appearances. I have also been selected to serve as an Honors Writing Scholar.

At Carolina Law I have served in leadership roles, including as an Academic Enrichment Group Leader, mentoring 1Ls to improve writing, research, legal analysis, and exam-writing skills. In the past year, I have excelled in two of my courses, earning the High Merit Award in Constitutional Law and in Reading, Research, Writing, and Advocacy 2. These awards are given to the student who earns the highest grade in each course. This summer I will work as a summer associate at WilmerHale in Manhattan.

I am seeking a term clerkship with you because of your distinguished career in the realm law. I try today to live my life according to my personal values, which include service, equity, justice, anti-subordination, and advocacy for the dispossessed. I see your jurisprudence as emblematic of each of those values. I believe I must thoroughly familiarize myself with the work of jurists well-versed in a variety of practice fields to obtain a fully informed perspective, and to develop practical, workable solutions to the hardships created by injustice. It would be a privilege to serve in your chambers for the 2024–2025 term.

My considerable bank of life experiences enables me to draw from non-academic knowledge in my work. Prior to law school, I worked for four years in the legal field. I conducted pre-voir-dire research on potential jurors for multi-million-dollar civil litigation trials, and most recently I worked as intake manager at NC's largest criminal law firm, focusing on traffic law. At both jobs I was consistently recognized for my high proficiency, earning promotions to positions of responsibility and oversight.

At age 35, I have worked on a range of meaningful non-academic and non-work causes. I was a legal reporter during the RICO trial of the Greensboro Almighty Latin King and Queen Nation. I advocated for queer and trans prisoners through Hearts on a Wire during my time in Philadelphia. I have intensely scrutinized restorative justice practices as a researcher and writer on the Greensboro Massacre. My forthcoming Note publication in the North Carolina Law Review advocates for massive automatic debt cancellation for people who have effectively had their driving privileges revoked due to their poverty. And I am currently drafting another article discussing the rights of the mentally ill in the context of involuntary commitment.

The professors, community members, and business leaders I have worked with have praised my curiosity, diligence, and consistency. I believe these traits are well-suited for the demands of your docket. My maturity and my commitment to service are assets I am eager to put at your disposal. With this cover letter, I have included my résumé, writing samples, and an unofficial transcript. Letters of recommendation from Professors Mary-Louise Frampton, Joseph Kennedy, and Rachel Gurvich are included under separate cover. It would be a great honor to interview with you, and I thank you for your time and consideration.

Respectfully,



Daniel Stainkamp

Daniel E. Stainkamp

206 Purefoy Road, Chapel Hill, NC 27514 • (704) 246-9256 • daniel.stainkamp@unc.edu

EDUCATION

University of North Carolina School of Law, Chapel Hill, North Carolina

Juris Doctor, expected May 2024

Overall G.P.A.: 3.67 (Top Twenty Percent of Class)

- *North Carolina Law Review*, Comments Editor
- High Merit Awards: Constitutional Law; RRWA 2
- Honors Writing Scholar (2023 – 2024)
- National Lawyers Guild, Vice President (2022 – 2023)
- Academic Enrichment Group Leader (2022 – 2023)
- Merrill & Holt Scholar (2022 – 2023)

University of North Carolina at Chapel Hill, Chapel Hill, North Carolina

Bachelor of Arts, Journalism; minors in Philosophy and Poetry, May 2009

- *The Daily Tar Heel*, Staff Writer
- Dean's List four of eight semesters

PUBLICATION

Auto-Jubilee—A Case for Massive Automatic Driver's License Restoration for Debtor-Suspendees, N.C. L. Rev. (forthcoming 2024).

EXPERIENCE

WilmerHale, New York, New York

Incoming Summer Associate — May 2023 – July 2023

The Greensboro Massacre — Justice on Trial, Chapel Hill, North Carolina & Greensboro, North Carolina

Legal Research Assistant — December 2021 – present

- Conduct archival research and interview stakeholders, compile data to be used in upcoming book

Criminal Law: Cases, Controversies and Problems, Second Edition (West), Chapel Hill, North Carolina

Editorial Research Assistant — May 2022 – August 2022

- Copyedited and line-edited a criminal law textbook written by UNC Law Professor Joseph Kennedy

University of North Carolina School of Law Pro Bono Program, Chapel Hill, North Carolina (83 hours)

- SNAP Felony Ban Research Project
- Eviction Research Project
- Juvenile Sentence Review Board Project
- Expunction Clinic Project

iTicket.law, Chapel Hill, North Carolina

Intake Manager and Law Clerk, December 2018 – October 2021

- Liaised with attorneys to prepare client case files
- Oversaw, mentored team of 12 legal assistants
- Managed intakes daily, pursued outreach and consulted clients regarding high-level offenses

Jury-X, Chapel Hill, North Carolina

Editorial Coordinator, Trial Manager, and Researcher, October 2017 – May 2020

- Oversaw a team of 12-14 legal researchers
- Compiled juror data for civil litigation trials
- Devised client education presentations; wrote reference, training and onboarding materials

LAVA Community Center, Philadelphia, Pennsylvania

Board Member, Treasurer, Events Coordinator, August 2013 – November 2016

- Facilitated monthly board meetings, managed finances, wrote grants, coordinated events, trained volunteers

AmeriCorps, The Servant Center, Greensboro, North Carolina

Case Manager, March 2011 – March 2012

- Coordinated resources and counseling for veterans experiencing mental illness, addiction, and homelessness

ABCO Automation, Brown's Summit, North Carolina

Technical Writer, November 2009 – February 2011

- Wrote end-user manuals for machine operators, collaborated with supervisor to design diagrams, edited copy

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